UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

LORI A. ZARLENGA BLAQUIERE,

Plaintiff,

vs. C.A. No. 06-534ML

EDWARD A. CHARBONEA, individually and in his capacity as Chief of Police of the North Kingstown Police Department, et al.,

Defendants.

DEFENDANTS, JOHNSON AND KELLEY'S RULE 11 MOTION

Now come defendants, Johnson and Kelley and pursuant to R.C.P. 11(c)(1)(A) move for appropriate sanctions, including dismissal, because the plaintiff has violated Rule 11(b) including but not limited to making allegations in the complaint which have no evidentiary support. Defendants rely on their memorandum of law attached and incorporated herein.

Defendants,
By their attorney,

/s/ Marc DeSisto

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CERTIFICATION

I hereby certify that this document has been filed electronically with the Court on March 26, 2007 and is available for viewing and downloading from the ECF system. A true copy of the within was mailed, postage prepaid to:

Lori Zarlenga Blaquiere
101 Border Street
West Warwick, RI 02893

/s/ Marc DeSisto

Marc DeSisto, Esq.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

LORI A. ZARLENGA BLAQUIERE, *Plaintiff,* vs. EDWARD A. CHARBONEA, individually and in his capacity as Chief of Police of the North Kingstown Police Department, et al., *Defendants.*	C.A. No. 06-534ML

DEFENDANTS, JOHNSON AND KELLEY'S MEMORANDUM OF LAW IN SUPPORT OF THEIR RULE 11 MOTION

I. INTRODUCTION

Plaintiff has filed a 78 page complaint naming 22 individuals and six corporations or entities as defendants. In addition to the defendants bringing this motion, the plaintiff has included the current governor of the State of Rhode Island, a former United States Senator of the State of Rhode Island, the United States Attorney's office and the Department of Justice.

Starting on page 10 and following through to page 77, the complaint contains unnumbered paragraphs with specific allegations. Among the allegations, plaintiff claims:

1. That defendant Showa Denko K.K. is engaged in an ongoing criminal conspiracy which includes to "have plaintiff murdered" (page 13 of the complaint);
2. That this same defendant (Showa Denko K.K.) employed "corrupt lawyers" who "conspired with all the Courts at every level to sabotage plaintiff's case" (page 15 of the complaint, the plaintiff is referring to a previous case that she filed);
3. Plaintiff claims that her son "is an informant in connection with Showa Denko K.K." and is being protected by the West Warwick Police (page 21).
4. Plaintiff claims that her son engaged "in a criminal conspiracy to murder plaintiff in connection with Showa Denko K.K. is for reasons of financial gain" (page 22).

5. The plaintiff further claims that “law enforcement, among others are engaged in a criminal conspiracy to murder plaintiff in connection with Showa Denko K.K.” (page 26).

6. Plaintiff further claims that “on January 22, 2006, plaintiff was kidnapped and assaulted by Warwick, Rhode Island Police Officer Joseph E. Mee, who, among others are engaged in a criminal conspiracy to murder plaintiff in connection with Showa Denko K.K.” (page 34).

7. Plaintiff claims her father is an informant for Showa Denko K.K. (page 34).

8. Plaintiff claims that the Speaker of the House, William Murphy, “was covering up for law enforcement, among others, engaged in a criminal conspiracy to murder plaintiff in connection with Showa Denko K.K.”

9. Plaintiff claims that “the Department of Justice, Department of Attorney General, Federal Bureau of Investigations and the Department of Homeland Security in Washington D.C. were covering up for law enforcement, among others engaged in a criminal conspiracy to murder plaintiff in connection with Showa Denko K.K.” (page 47).

II. ARGUMENT

The plaintiff has made outrageous allegations that virtually all of the defendants are in a conspiracy to commit the crime of murder against her. These allegations have no evidentiary support and are not likely to have any evidentiary support after a reasonable opportunity for further investigation of discovery. Defendants respectfully request that this Court hold an initial hearing regarding the plaintiff’s claims of conspiracy to commit murder against her so that the Court can make an initial determination as to whether or not this rule has been violated.

Defendants are not seeking a monetary sanction. Rather, defendants seek to preclude the time consuming and expensive process of litigating this case, until the plaintiff can make a showing that there is a factual basis for her outrageous claims.

III. CONCLUSION

For the reasons stated, defendants respectfully seek this Court's order that plaintiff show cause why her suit should not be dismissed for lack of an evidentiary basis to the claims she has made.

Defendants,
By their attorney,

/s/ Marc DeSisto
Marc DeSisto, Esq. (#2757)
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